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Honorable William Pauley III U.S. District Court, SDNY 500 Pearl Street, Room 2210 New York, NY 10007

April 15, 2008

Re: William Morales v. City of New York et al.

07CV8457

Your Honor,

This is a request for a sixty day extension of discovery in the above referenced case, and an adjournment of the final pretrial conference and JPTO deadline; this is the second request to extend discovery, and my adversary, Assistant Corporation Counsel Hugh Zuber, joins in the request.

The attorneys have attempted in good faith to save costs and time in the matter by negotiating a fair settlement of the matter, but it is appearing less likely than we had anticipated.

The case involves allegations of an assault on an inmate by correction officers at Rikers' Island; the facility investigation and medical records have been exchanged; defendants still must provide the investigation from the Investigations Division, and depositions and a site visit are still to be conducted.

The requested extension would result in an August 18, 2008 discovery deadline and a

September 18, 2008 JPTO deadline.

Andrew B. Stoll

Sincerely Yours.

Stoll, Glickman & Bellina L.L.P.

cc:

ACC Hugh Zuber

New York City Law Department

By fax: 212-788-9776

The final pre-tonal conference is adjurned to Juditer 10, 2008 at 12:00 pm